

## REMARKS

### I. Introduction

In the Office Action, Claims 1-22 were rejected in view of the proposed combination of U.S. Patent No. 5,963,864 to O'Neil et al. and U.S. Patent No. 5,771,279 to Cheston, III et al. As admitted in the Office Action, O'Neil et al. does not teach a Centrex line. Cheston, III et al. was relied upon in an attempt to cure this deficiency. However, because there is no motivation to combine O'Neil et al. and Cheston, III et al. and because the proposed combination does not teach each and every claim element, Applicants respectfully submit that the rejections of Claim 1-22 should be withdrawn.<sup>1</sup>

### II. There Is No Motivation to Combine O'Neil et al. and Cheston, III et al.

The Examiner asserted that one skilled in the art would have been motivated to combine O'Neil et al. and Cheston, III et al. "because O'Neil allows for the interconnection of two communication systems so that a wireline may be connected to a wireless unit and this would allow for an improved method of call completion using an existing telecommunications network." Applicants respectfully submit that this is insufficient motivation.

O'Neil et al. teaches an access tandem 32 in the PSTN 12 that allows for the interconnection of the PSTN 12 and the wireless network 14 (see Figure 1). O'Neil et al. describes this interconnection as necessary for a call from a wireline unit to be connected to a wireless unit. As indicated by its name, the access tandem 32 gives *access* to a different type of network (in O'Neil et al., the wireless network). Accordingly, the teaching provided by O'Neil et al. is one of *access* — ***not replacement***. Simply put, O'Neil et al. teaches providing the PSTN 12

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<sup>1</sup> Applicants reserve the right to present argument at a later time as to why one skilled in the art would not have been motivated to combine O'Neil et al. and Cheston, III et al.

with *access* to the wireless network 14 — ***not replacement*** of the PSTN 12 by the wireless network 14. Accordingly, using the motivation asserted in the Office Action, one skilled in the art would use the access tandem 32 in the PSTN 12 to interconnect the PSTN 12 and a Centrex network to give *access* to the Centrex network. The teaching of using an access tandem 32 to provide *access* to a different telecommunications system in no way provides motivation for ***replacing*** the non-Centrex line in O'Neil et al. with a Centrex line, which is needed to cure the admitted deficiency in O'Neil et al. Accordingly, the asserted motivation is insufficient, and, as such, the rejections of the claims should be withdrawn.

### **III. The Proposed Combination Does Not Teach All of the Claim Elements**

Even if there were motivation to combine O'Neil et al. and Cheston, III et al., the proposed combination would not render the claims unpatentable because the proposed combination does not teach all of the claim elements. Each of the independent claims recites a wireless extension of a Centrex line that provides extension dialing when the wireless extension of the Centrex line is within a limited service area defined for a Centrex customer premises area. The Office Action asserted that col. 8, lines 10-15 of Cheston, III et al. teaches this element.<sup>2</sup> Applicants respectfully disagree.

As a first matter, there is no teaching in the cited passage of a wireless extension of a Centrex line. The cited passage merely teaches the use of an Area Wide Centrex, which is a plurality of interconnected local central offices, each of which is connected to a number of local ***wired*** telephone lines that are designated as members of a business group. There is no teaching in Cheston, III et al. of a ***wireless extension*** of a Centrex line, as recited in the claims.

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<sup>2</sup> The Office Action admitted that O'Neil et al. does not teach this element.

Additionally, there is no teaching of a limited service area defined for a Centrex customer premises area, as recited in the claims. In Area Wide Centrex, the Centrex intelligence is taken out of local central offices and is moved to a central point so that the Centrex features are provided to customers over a larger geographical area. Accordingly, the term “area” in Area Wide Centrex is not of a limited service area defined for a Centrex customer premises area but rather the area that services several Centrex customer premises. Nevertheless, since Cheston, III et al. does not teach a wireless extension of a Centrex line, it necessarily does not teach providing extension dialing when the wireless extension of the Centrex line is within a limited service area defined for a Centrex customer premises area.

Because Cheston, III et al. does not teach the features that were admitted to be missing in O’Neil et al., the proposed combination of O’Neil et al. and Cheston, III et al. does not teach each and every element of the claims. Accordingly, Applicants respectfully submit that the rejections of Claims 1-22 should be withdrawn.

#### **IV. A Notice of Allowance Should Be Issued Immediately**

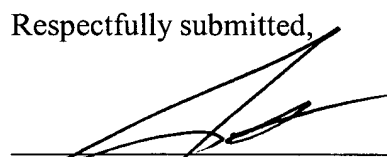
Applicants note that this application has been pending *almost six years* and that the present Office Action is the *sixth Office Action* issued by the Examiner. The rejections in four of those Office Actions were withdrawn due to lack of motivation to combine (once, after Applicants filed a Notice of Appeal), and the rejections in the present Office Action should also be removed for lack of motivation to combine (as well as for the references not teaching each and every claim element). It is apparent that, after conducting numerous prior art searches, the Examiner has not found prior art that renders the claims unpatentable. Accordingly, Applicants respectfully request that a Notice of Allowance be issued immediately.

**V. Conclusion**

In view of the above remarks, Applicants respectfully submit that this application is in condition for allowance. Reconsideration is respectfully requested. If there are any questions concerning this Response, the Examiner is asked to phone the undersigned attorney at (312) 321-4719.

Dated: September 19, 2006

Respectfully submitted,



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